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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to Individual Case No.
3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING SCHEDULING**

Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and Defendants Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively “Philips”) have conferred by and through their counsel and, subject to the Court’s approval, **HEREBY STIPULATE AS FOLLOWS:**

WHEREAS, on July, 30 2014, Dell served its Second Set of Interrogatories and Second Set of Requests for Production on Philips.

1 WHEREAS, Philips responded and objected to Dell's Second Set of Interrogatories and
2 Second Set of Requests for Production on September 2, 2014.

3 WHEREAS, Philips objected to Dell's Second Set of Interrogatories on the basis that Dell
4 had exceeded its allotted 25 interrogatories as provided for under Federal Rule 33.

5 WHEREAS, other plaintiffs in the above-stated action have received discovery responses
6 with similar objections and intend to file motions to compel with the Special Master challenging
7 the defendants' calculation of the number of interrogatories received from the plaintiffs groups.

8 WHEREAS, September 5, 2014 was the deadline to complete fact discovery in the Dell
9 action.

10 WHEREAS, September 12, 2014 is the deadline for all parties to object to or move to
11 compel additional responses for all written discovery responses in the Dell action.

12 WHEREAS, Dell and Philips have agreed to await the Special Master's ruling on the
13 proper method of calculating the number of interrogatories under Federal Rule 33 before
14 evaluating whether Philips is required to provide more substantive responses to Dell's Second Set
15 of Interrogatories.

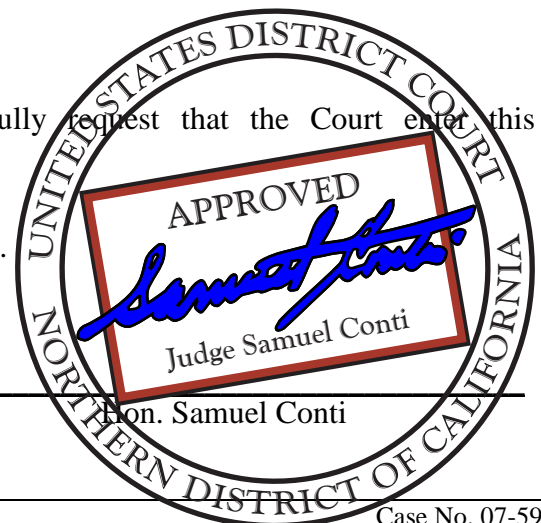
16 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between counsel
17 as follows: the deadline for Dell to move to compel additional responses for written discovery in
18 the Dell action with respect to Dell's Second Set of Interrogatories shall be moved to fourteen
19 days after any order by the Special Master addressing the proper method of calculating the
20 number of interrogatories under Federal Rule 33. All other dates in the Scheduling Order are
21 unaffected by this stipulation.

22 * * *

23 The undersigned parties jointly and respectfully request that the Court enter this
24 stipulation as an order.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: October 2, 2014



27 Hon. Samuel Conti

United States District Judge

DATED: September 12, 2014

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By: /s/ Debra D. Bernstein

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.